IN THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF DELAWARE

Chapter 11
Case No. 01-01139 (JKF)
(Jointly Administered)
Related Docket No. 9314
Hearing Date: October 24, 2005, 12:00 noon
Agenda Item No. 10

DEBTORS' MOTION FOR LEAVE TO FILE A STATUS REPORT AND REPLY WITH RESPECT TO THE FOURTEENTH OMNIBUS OBJECTION TO CLAIMS (NON-SUBSTANTIVE)

On September 1, 2005, the Debtors filed their Fourteenth Omnibus Objection to Claims (Non-Substantive) (the "14th Omnibus Objection), in which the Debtors asserted non-substantive objections to PD Claims¹ that were filed after the Bar Date and/or contained no supporting documentation.

Certain of the claimants whose claims were included in the 14th Omnibus Objection have filed responses or otherwise contacted the Debtors' concerning their claims. The Debtors have worked with these claimants in an attempt to resolve the Debtors objections to their claims, and the Debtors have reached resolutions with most of the claimants.

The Court is scheduled to hear the 14th Omnibus Objection at its hearing on October 24, 2005. The Debtors believe that it would be extremely helpful to the Court and other parties affected by the claims in the 14th Omnibus Objection to receive a status report concerning these claims. The Status Report and Reply attached as Exhibit A (i) identifies those claims that have

¹ Any capitalized terms not otherwise defined herein have the meanings given in the 14th Omnibus Objection.

been resolved, along with a description of the proposed agreed-upon treatment; and (ii) identifies and describes the status of claims where the claimant responded, but no agreement has been reached.

Wherefore, the Debtors request leave to file the Debtors' Status Report and Reply with Respect to Claims Objected to in the Fourteenth Omnibus Objection.

Wilmington, Delaware Dated: October 14, 2005

Respectfully submitted,

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IT IS HEREBY ORDERED that the Debtors are granted leave to file their Status Report and Reply with Respect to the Fourteenth Omnibus Objection to Claims (Non-Substantive), which will be heard at the October 24, 2005 hearing in these cases.

Wilmington, Delaware	
Dated: October, 2005	
	UNITED STATES BANKRUPTCY JUDGE